

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10245-RGS
)
 ANDREW PERRY)

UNOPPOSED MOTION TO
MODIFY CONDITIONS OF PRETRIAL RELEASE

Defendant, Andrew Perry, moves this Court to modify his conditions of pretrial release to change his residence. As reasons therefore, defendant states the following:

1. The defendant first appeared in this matter upon his arrest on July 21, 2004. After initially ordering detention, Chief Magistrate Judge Bowler on July 23, 2004 conditionally released the defendant to his long-time companion's home in Westboro. His companion signed an appearance bond in the amount of \$50,000 to ensure his continued appearance.
2. As additional conditions, the defendant was placed on a curfew to be monitored electronically, ordered to seek and maintain employment, and ordered not to enter Suffolk county except for purposes of court appearances and attorney meetings.
3. The defendant remained in Westboro from his release until February 23, 2005 when he and his companion amicably separated. He worked full time and complied with his conditions of release in all respects while in Westboro.
4. Judge Bowler on March 2, 2005 amended the conditions of release to allow the defendant to live in Revere, Massachusetts and to personally sign the appearance bond.
5. This Court, on the recommendation of Pretrial Services, further amended the conditions to remove the condition of electronic monitoring while leaving the curfew in effect.
6. Pretrial Services reports that the defendant has been compliant with all of the conditions of release, including

the curfew and reporting requirements. No new criminal activity has been reported.

7. Defendant has recently notified Pretrial Services and undersigned counsel that the home in which he is living in Revere has been sold and the new owners have asked the current tenants to vacate by June 20, 2005.
8. Defendant's sister, Kiyette Perry, has offered to allow defendant to live with her at her home at 33 Sumner St., Revere, MA 02151. Defendant will share a room with his nephew. Pretrial Services has determined this residence to be appropriate for defendant.
9. All other conditions of release will remain the same.
10. Pretrial Services concurs with this modification but requires judicial approval by the Court to modify these conditions.
11. The government does not oppose this motion.

Wherefore, defendant respectfully requests that this Court modify the conditions of release to allow defendant to change his residence.

Respectfully submitted,

MICHAEL SULLIVAN
UNITED STATES ATTORNEY

ANDREW PERRY
By His Attorney,

/s/ Timothy Watkins o/b/o
William H. Connolly
Assistant United States
Attorney
United States Courthouse
Suite 9200
1 Courthouse Way
Boston, MA 02210
Tel: 617-748-3174

/s/ Timothy Watkins
Timothy G. Watkins
Federal Defender Office
408 Atlantic Ave. 3rd Floor
Boston, MA 02110
Tel: 617-223-8061